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April 18, 2024

BY ECF

Honorable Katharine H. Parker  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

Re: *Martinez v. Finger Management Corp. et al.*  
Case No. 23 Civ. 5901 (JPO) (KHP)

Dear Magistrate Judge Parker:

We are counsel for Defendant Finger Management Corp. (“Finger”) in the above-referenced wage and hour matter, which is brought as a putative collective/class action. We write, on behalf of all parties, to jointly request that the Court: (1) adjourn the status conference currently scheduled for April 24, to May 29, 30, or 31, 2024, or an alternative date convenient for the Court; (2) extend the deadline for a pre-conference letter to a date that is one-week prior to the status conference; and (3) extend the final deadline for fact discovery from May 16, to August 16, 2024.

The parties further request that the Court approve the parties’ following, proposed briefing schedule for Plaintiff’s motion to conditionally certify a collective pursuant to FLSA § 216(b): (a) Plaintiff’s motion shall be filed by May 16, 2024; (b) Defendants shall file their opposition(s) by June 17, 2024; and (c) Plaintiff shall file reply, if any, by July 1, 2024.

This is the parties’ third request for an adjournment of the status conference. This is the parties’ first request for the Court’s approval of a briefing schedule for Plaintiff’s conditional certification motion and the first request to extend the final deadline for fact discovery.

As to the status of discovery, on February 16, 2024, Finger responded to Plaintiff’s first set of discovery demands and produced 688 pages of documents. Last week, following the Court’s approval of the parties Proposed Confidentiality Order and pursuant to its prior responses, Finger provided a substantial, supplemental document production of over 900 pages of documents, which Plaintiff’s counsel has not yet had the opportunity to fully review. Plaintiffs have produced approximately 855 pages of documents, the last batch having been produced on March 18, which corresponded to Plaintiff’s formal responses to Finger’s discovery demands, the final pieces of

Honorable Katharine H. Parker  
April 18, 2024  
Page 2

which were served on March 21, 2024. Defendants Parkview Apartments, LLC, John Volandes, and Peter Volandes (collectively the “Parkview Defendants”) served their responses to Plaintiff’s discovery demands on April 17, 2024. The parties have not yet exchanged deficiency letters, but they anticipate engaging in discussions regarding outstanding discovery with the goal of resolving any disputes.

The parties appreciate the Court’s consideration of this matter.

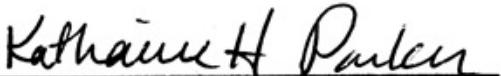
Respectfully submitted,

/s/ Jeffrey Ruzal

Jeffrey Ruzal

**APPLICATION GRANTED: The Case Management Conference in this matter scheduled for Wednesday, April 24, 2024 at 10:00 a.m. in Courtroom 17D, 500 Pearl Street, New York, NY 10007 is hereby rescheduled to Wednesday, June 12, 2024 at 2:00 p.m. Joint letter due by June 5, 2024.**

**APPLICATION GRANTED**



**Hon. Katharine H. Parker, U.S.M.J.**

04/19/2024